

REMARKS

Request for Examiner Interview.

Should the Examiner feel that this Response does not place the application in a condition for allowance, Applicants hereby request an Examiner Interview to expedite prosecution prior to issuance of another communication from the USPTO.

1/2. Claims 1-15, 22-25 are patentable over Boon et al (6,882,021) and Tu et al. (6,559,539) and Komiyama (6,329,708).

Claim 1 recites:

A semiconductor package comprising:
an image sensor die comprising:
a photo sensing surface, the photo sensing surface converting lights incident from an outside into electrical signals;
bond pads formed around the photo sensing surface;
first conductive bumps formed at the bond pads;
a non-photo sensing surface opposite to the photo sensing surface; and
side surfaces, each of the side surfaces formed between the photo sensing surface and the non-photo sensing surface;
a substrate comprising:
an insulative layer comprising a window formed at an area corresponding to the photo sensing surface of the image sensor die, the insulative layer attached to the non-photo sensing surface of the image sensor die by a first adhesive;
electrically conductive patterns formed at the insulative layer and connected to the first conductive bumps, the electrically conductive patterns extending over one of the side surfaces and the non-photo sensing surface of the image sensor die; and
first holes formed at the insulative layer corresponding to the non-photo sensing surface so that the electrically conductive patterns are opened downward; and
a glass attached to the insulative layer of the substrate by a second adhesive to cover the window.
(Emphasis added.)

As set forth in the Amendment filed on February 23, 2006, Boon et al., Tu et al. and Komiyama et al. do not teach or suggest a semiconductor package as claimed in Claim 1.

In response to the Applicants' arguments, the Examiner now states:

The Applicants state that the window is not claimed to be made of glass is irrelevant to the rejection. **The Examiner made a mistake and has corrected it to stating the glass covers the window.** (Office Action, page 4, emphasis added.)

Applicants respectfully submit that the Examiner has failed to clarify where Boon et al., Tu et al. or Komiyama et al teach or suggest "the glass covers the window" as asserted by the Examiner.

Specifically regarding Boon et al., the Examiner continues to state:

Boon et al. **do not show** the insulative layer extending over a side surface of side sensor die ... , **the window having of glass covering it and attached to the insulative layer** ... (Office Action, page 3.)

The Examiner does not discuss a window with regards to Tu et al.

With regards to Komiyama, the Examiner states:

Komiyama teaches (e.g. Figures 7 to 9) to have an insulative layer 609a **comprising a window (the area above passivation layer 605b)** ... (Office Action, page 3, emphasis added.)

The only support for the Examiner's assertion is the Examiner's own statement:

Additionally, it is common and therefore obvious, to have glass covering the window and attached to the insulative layer. (Office Action, page 4.)

Initially, Applicants respectfully submit the Examiner has failed to establish a *prima facie* case of obviousness. As set forth in MPEP § 2143, page 2100-135, Rev. 3, August 2005:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.** (Emphasis added.)

Applicants respectfully submit that the Examiner has failed to identify where Boon et al., Tu et al. or Komiyama et al., either alone or in combination, teach or suggest "the glass covers the window" as asserted by the Examiner. Thus, the Examiner has failed to callout where the prior art references (or references when combined) teach or suggest all the features of Claim 1. Accordingly, the Examiner has failed to establish a *prima facie* case of obviousness.

Further, Applicants respectfully submit the Examiner has failed to consider Claim 1 as a whole. Specifically, as set forth in MPEP 2141.02, page 2100-130, Rev. 3, August 2005:

In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. ... **Distilling an invention down to the "gist" or "thrust" of an invention disregards the requirement of analyzing the subject matter "as a whole."** (Emphasis added.)

Applicants respectfully submit that the Examiner's statement that "it is common and therefore obvious, to have glass covering the window and attached to the insulative layer" fails to consider Claim 1 as a whole.

For at least the above reasons, Claim 1 is allowable over Boon et al, in view of Tu et al. and Komiyama. Claims 2-12, which depend from Claim 1, are allowable for at least the same reasons as Claim 1.

Claims 13, 24 are allowable for reasons similar to Claim 1. Claims 14-15, which depend from Claim 13, are allowable for at least the same reasons as Claim 13. Claims 22-23, 25, which depend from Claim 24, are allowable for at least the same reasons as Claim 24.

For the above reasons, Applicants respectfully request reconsideration and withdrawal of this rejection.

Entry of this Response.

In this Response, the claims have not been amended. Accordingly, this Response does not raise new issues or considerations. Applicants respectfully request entry of this Response to clarify the issues, e.g., for an Appeal.

Conclusion

Claims 1-15, 22-25 are pending in the Application. For the foregoing reasons, Applicants respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully

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requested to telephone the undersigned Attorney for
Applicant(s).

CERTIFICATE OF MAILING

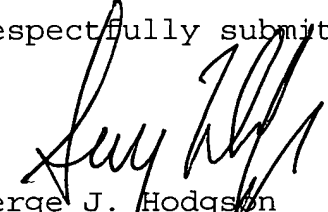
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1450, Alexandria, VA 22313-1450, on June 23, 2006.



Attorney for Applicant(s)

June 23, 2006
Date of Signature

Respectfully submitted,


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